

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

VOTER REFERENCE FOUNDATION, LLC,

Plaintiff,

v.

Case No. 1:22-cv-00222-JB-KK

**RAÚL TORREZ, in his official capacity as New
Mexico Attorney General;**

and

**MAGGIE TOULOUSE OLIVER, in her official
capacity as Secretary of State of New
Mexico,**

Defendants.

DEFENDANTS' OBJECTIONS TO EXHIBITS

Defendants, by and through undersigned counsel, hereby provide their objections to the *Joint Exhibit List & Parties' Exhibit Lists* filed with the Court on August 29, 2023. In filing the Joint Exhibit List, the Parties stipulated that "Defendants reserve the right to argue any objections preserved in response to any discovery requests contained in the Joint Exhibit List." Defendants' discovery responses are listed at JE24 – JE33. The general and specific objections to Plaintiff's various interrogatories, requests for admission, and requests for production are too numerous to restate in an individual pleading. Defendants reserve all objections as stated in the exhibits and will clarify and argue objections as the various discovery requests become relevant at trial.

By: /s/Jeff Dan Herrera
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State Maggie Toulouse Oliver*

CERTIFICATE OF SERVICE

On August 31, 2023 I filed the foregoing document through the Court's CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Jeff Dan Herrera

Jeff Dan Herrera